


DECLARATION OF SAMAN MOVASSAGHI GONZALEZ

I, Saman Movassaghi Gonzalez, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. I am a Managing Attorney at U.S. Immigration Law Counsel, a law firm based in Pembroke Pines, Florida.
3. I am an attorney in good standing in the State of Florida. I specialize in the practice of immigration law.
4. Since July 2025, I have represented one client detained at the facility known as “Alligator Alcatraz,” J.M.C. J.M.C. arrived at Alligator Alcatraz on July 8, 2025, after being detained by the local Miami CBP office. On or about July 11, 2025, I submitted a request for a video attorney visitation (“VAV”) call with J.M.C. and received an appointment on July 18, 2025. J.M.C.’s wife called our office on July 26, 2025 to confirm that J.M.C. had been moved to Broward Transitional Center (BTC) in Pompano Beach, Florida. The same day, on July 26, 2025, we confirmed his new location at the BTC.
5. While at Alligator Alcatraz, J.M.C.’s primary complaint was the large number of mosquitoes in the facility and the absence of mosquito nets. During our VAV call, I observed him swatting at mosquitos throughout the conversation.
6. While J.M.C. was detained at Alligator Alcatraz, I was unable to locate him in ICE’s online detainee locator at <https://locator.ice.gov/odls/>.
7. Although the VAV call was ultimately scheduled, my client and I still faced significant restrictions. The call was not confidential because it took place in a public space in the visitation area. The space I was in was surrounded by chain-link fencing, which did not provide us with adequate privacy to have a confidential conversation. Given J.M.C.’s surroundings on the call, it was likely there was an officer nearby and possibly other detained people participating in their own calls within hearing range.
8. I was not able to exchange or share any documents with my client during the VAV call.
9. J.M.C. previously had a Notice to Appear filed and was already in removal proceedings. Jurisdiction has since been transferred from the Miami Immigration Court to the Krome

Detention Center. I have now been able to file an EOIR-28 and a bond motion on his behalf. His bond hearing is scheduled for August 12, 2025, and a master hearing is scheduled for August 14, 2025. I also submitted an additional EOIR-28 for the removal proceedings to confirm our representation in the event that bond is not granted and he remains detained.

Executed on 11 day of August, 2025, at Pembroke Pines, Florida.



Saman Movassaghi Gonzalez